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6 Attorneys for Plaintiff
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
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12 Plaintiff,
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14 v.
15 MANUEL YANES and
JORGE LUIS YANES,
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17 Defendants.

CASE NO. 1:22-CR-00307-JLT-SKO

STIPULATION AND PROTECTIVE ORDER

17 WHEREAS, the discovery in this case involves information, including documentation,
18 photographs, audio recordings, and video recordings, related to a confidential informant whose safety
19 may be compromised if their identity were disclosed (the “Protected Information”); and

20 WHEREAS, the parties desire to have the Protected Information produced to undersigned
21 defense counsel;

22 The parties agree that entry of a stipulated protective order is appropriate.

23 THEREFORE, Manuel Yanes and Jorge Luis Yanes (“Defendants”), by and through their
24 counsel of record, respectively, Darryl Young and Galatea DeLapp (“Defense Counsel”), and the United
25 States of America, by and through Assistant United States Attorney Jessica A. Massey, hereby agree and
26 stipulate as follows:

27 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
28 Criminal Procedure, and its general supervisory authority.

2. This Order pertains to the Protected Information, the Bates numbers pertaining to which will be specified when produced to Defense Counsel (“the discovery”). This Order also relates to any verbal communications between the government and Defense Counsel about the confidential informant.

3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any documents, recordings, or other information, verbal or written, that contain Protected Information with anyone other than defense investigators and support staff. Defense Counsel may permit Defendants to review un-redacted documents in the presence of their attorney, defense investigators, and support staff. The parties agree that Defense Counsel, defense investigators, and support staff (the “defense team” for each respective defendant) shall not allow Defendants or anyone else outside of the defense team to copy or retain Protected Information contained in the discovery.

4. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the government. Defense Counsel will return the discovery to the government or certify that it has been destroyed at the conclusion of the case.

5. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

6. Defense Counsel shall be responsible for advising Defendant, employees, other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel *unless and until* substituted counsel agrees also to be bound by this Order.

8. Defense Counsel reserves the right to later seek to have the terms of this Order modified or revoked. Defense Counsel agrees to return the discovery to the Government in its complete form if the

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terms of this Order are modified or revoked if so requested by the United States.

IT IS SO STIPULATED.

DATED: November 18, 2022

PHILLIP A. TALBERT
United States Attorney

By: /s/ Jessica A. Massey
JESSICA A. MASSEY
Assistant U.S. Attorney

DATED: November 18, 2022

By: /s/ Darryl Young
DARRYL YOUNG
Attorney for Defendant
MANUEL YANES

DATED: November 18, 2022

By: /s/ Galatea DeLapp
GALATEA DELAPP
Attorney for Defendant
JORGE LUIS YANES

ORDER

Pursuant to the parties' stipulation, and Rule 16(d) of the Federal Rules of Criminal Procedure, the Court enters the protective order as set forth in the parties' stipulation above.

IT IS SO ORDERED.

Dated: November 22, 2022

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE